

RTP:EWS  
F. #2023R00287

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

MARCIA JOSEPH,  
also known as  
"Marcia James,"  
"Marcia Lewis" and  
"Marcia Peters,"

Cr. No. 24cr4(ENV  
(T. 18, U.S.C., §§ 981(a)(1)(C), 1343 and  
3551 et seq.; T. 21, U.S.C., § 853(p); T.  
28, U.S.C., § 2461(c))

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

WIRE FRAUD

1. In or about and between April 2006 and March 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARCIA JOSEPH, also known as "Marcia James," "Marcia Lewis" and "Marcia Peters," together with others, did knowingly and intentionally devise a scheme or artifice to defraud Company-1, an entity the identity of which is known to the United States Attorney, in order to obtain money or property from it by means of one or more materially false and fraudulent pretenses, representations and promises, and, for the purpose of executing such scheme and artifice, did transmit or cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signals, pictures and sounds.

(Title 18, United States Code, Sections 1343 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

*By Carolyn Pokorny, Assistant U.S. Attorney*

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BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

MARCIA JOSEPH,

Defendant.

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**INFORMATION**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1343 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

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*Filed in open court this* \_\_\_\_\_ *day.*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Eric Silverberg, Assistant U.S. Attorney (718) 254-6365*